



Mark L. Johnson
(612) 373-8377 Direct
mjohnson@greeneespel.com

June 3, 2025

VIA ECF

The Honorable Vernon S. Broderick, U.S.D.J.
United States District Court, S.D.N.Y.
40 Foley Square
New York, NY 10007

Re: *Standard Insurance Company v. Minnesota Life Insurance Company et al.*
Case No.: 25-cv-00212 (VSB) (OTW)

Dear Judge Broderick:

On behalf of Defendants Minnesota Life Insurance Company and Securian Financial Group, Inc., pursuant to Your Honor's Individual Rules & Practices, I write to respectfully request leave to file: (i) Defendants' Memorandum of Law in Opposition to The Standard's Motion to Partially Dismiss the Securian Entities' Counterclaims or to Compel Arbitration and in Support of the Securian Entities' Cross Motion for Partial Judgment on the Pleadings (the "Brief") in redacted form; and (ii) an unredacted copy of the same under seal. Plaintiff Standard Insurance Company consents to this request.

In accordance with Section 6 of the S.D.N.Y. Electronic Case Filing Rules and Instructions and Section 5(B) of Your Honor's Individual Rules & Practices, Defendants are contemporaneously filing (i) a public copy of the Brief with the proposed redactions; and (ii) a copy of the Brief under seal, with the proposed redactions highlighted in yellow.

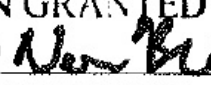
On May 20, 2025, Plaintiff filed a letter motion requesting leave to file (i) the Memorandum of Law in Support of The Standard's Motion to Partially Dismiss the Securian Entities' Counterclaims or to Compel Arbitration under seal, (ii) a public version of that brief with redactions, and (iii) Exhibit 1 to the Declaration of David J. Hotelling under seal. ECF No. 37. On May 21, 2025, the Court granted Plaintiff's Motion to Seal. ECF No. 44. In doing so, the Court permitted redaction of commercially sensitive information, including the potential earn-out payments associated with the parties' transaction and other related information. The Court has previously granted the parties' requests to seal similar information. *See* ECF Nos. 25, 29, 37.

Because the Brief includes the same information that the Court has previously permitted the parties to file with redactions, Defendants respectfully request that the Court permit identical redactions in Defendants' Brief. Defendants respectfully submit that this information should be

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redacted for the same reasons that the Court granted Plaintiff's Motion to Seal. *See* ECF No. 44. In the interest of preserving judicial resources, Defendants will not repeat those reasons but instead respectfully incorporates them by reference. ECF No. 37.

Accordingly, Defendants respectfully submit that there are sufficient grounds to permit redaction of the information referenced above and the sealing of the unredacted versions of the same.

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J.

Date: June 10, 2025

Respectfully submitted,

/s/ Mark L. Johnson

Mark L. Johnson (pro hac vice)
Benjamin L. Larson (pro hac vice)
GREENE ESPEL PLLP
222 S 9th St., Ste 2200
Minneapolis, MN 55402
(612) 373-8327
mjohnson@greeneespel.com
blarson@greeneespel.com

Leif Thorsten Simonson
SIMONSON LAW PLLC
400 South Fourth Street, Suite 401
Minneapolis, MN 55415
(612) 448-3330
leif.simonson@simonsonlaw.com

*Counsel for Minnesota Life
Insurance Company and Securian
Financial Group, Inc.*

MLJ/mcg

cc. All counsel of record (via ECF)